

CC 00-175

NOV - 3 2000

**Federal Communications Commission
Office of Secretary**

**1998 Biennial Regulatory Review –
Review of the Commission’s Broadcast Ownership
Rules and Other Rules Adopted Pursuant to Section
202 of the Telecommunications Act of 1996**

[illegible]

The WB notes that Viacom Inc., Fox Television Stations, Inc. and The Newspaper Association of America have all filed supplemental petitions arguing that they are prejudiced by the Commission's delay and requesting that the Commission immediately eliminate certain

²47 C.F.R. § 76.501(a).

2

broadcast ownership rules that are the subject of the above-captioned proceeding. The WB is similarly prejudiced by the Commission's inaction and is filing the enclosed Supplemental Comments to ensure a complete record and to echo the concerns raised by Viacom Inc. regarding how certain of the Commission's broadcast ownership rules act to create unnecessary regulatory barriers to the establishment of financially viable emerging networks.

In particular, as detailed in its Supplemental Comments, The WB is an emerging network with a distant connection with a cable operator. Continued application of the television station/cable system cross-ownership rule, a rule which the Commission itself determined almost seven years ago was no longer necessary in the public interest, stifles the development of emerging networks such as The WB. The Commission's delay in eliminating the television station/cable system cross-ownership ban in connection with its initial biennial review has hampered The WB's ability to compete with the established television networks to the detriment of the public interest.

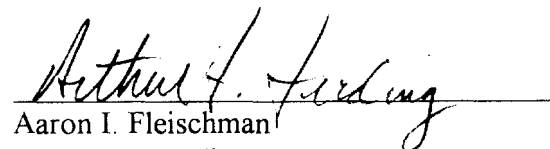
Accordingly, The WB respectfully requests that the Commission accept and consider the enclosed Supplemental Comments in connection with the above-captioned proceeding.

Respectfully submitted,

THE WB TELEVISION NETWORK

Handwritten signature of John D. Maatta in cursive script, written over a horizontal line.

John D. Maatta
Senior Vice President and General Counsel
The WB Television Network

Handwritten signature of Aaron I. Fleischman in cursive script, written over a horizontal line.

Aaron I. Fleischman
Arthur H. Harding
Christopher G. Wood
Regina Famiglietti Pace

FLEISCHMAN AND WALSH, L.L.P.
1400 Sixteenth St., N.W.
Suite 600
Washington, D.C. 20036

202-939-7900

Dated: January 27, 2000

Its Attorneys

CERTIFICATE OF SERVICE

I, Cecilia Gornak, a secretary at the law firm of Fleischman and Walsh, L.L.P., hereby certify that copies of the foregoing "Request for Leave to File" were served this 27th day of January, 2000, via first-class mail, postage prepaid, upon the following:

*William Kennard, Chairman
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Harold Furchtgott-Roth, Commissioner
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Gloria Tristani, Commissioner
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Susan Ness, Commissioner
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Michael K. Powell, Commissioner
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Roy Stewart, Chief
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W., 2nd Floor
Washington, DC 20554

*Deborah Lathen, Chief
Cable Services Bureau
Federal Communications Commission
445 12th Street, S.W., 3rd Floor
Washington, DC 20554

*Barbara Kreisman, Chief
Video Services Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W., 2nd Floor
Washington, DC 20554

*Thomas Power
Office of the Chairman
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Helgi Walker
Office of Commissioner Furchtgott-Roth
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*David Goodfriend
Office of Commissioner Ness
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Marsha MacBride
Office of Commissioner Powell
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Rick Chesson
Office of Commissioner Tristani
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

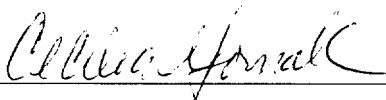
*Clay Pendarvis, Chief
Television Branch
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

*Christopher J. Wright
General Counsel
Federal Communications Commission
445 12th Street, S.W., 8th Floor
Washington, DC 20554

*Roger Holberg
Federal Communications Commission
445 12th Street, S.W., 2nd Floor
Washington, DC 20554

International Transcription Services, Inc.
1231 20th Street, N.W.
Washington, DC 20036

*Via hand delivery



..ODMA\MHODMA\Manage;113682;1